

# **EXHIBIT A**

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>[Claims 1 and 34]</p> <p><b>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</b></p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p>	[AGREED]	[AGREED]	<p>Preambles of independent claims 1 and 34 are substantive limitations and the clause “communications, command, control and sensing system” in each such preamble does not need to be further construed.</p>

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<p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p><b>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</b></p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication</p>			

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<p>protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and</p>			

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receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.			
<p>[Claims 1, 2, 28, and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of <b>external devices</b> comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said <b>external devices</b> wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said <b>external devices</b>;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the</p>	[AGREED]	[AGREED]	A device separate from the handset and the base station.

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<p>memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said <b>external devices</b> and receiving from said <b>external devices</b>, infra-red frequency signals in accordance with said communications protocols.</p> <p>2. The communication, command, control and sensing system of claim 1 further comprising:</p> <p>a radio frequency transceiver coupled to said microprocessor for transmitting to</p>			

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<p>said <b>external devices</b> and receiving from said devices, radio frequency signals at variable frequencies within a predetermined frequency range and in accordance with said communication protocols; and</p> <p>a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said <b>external devices</b> via either radio frequency signals and infra-red signals.</p> <p>28. The communications, command, control and sensing system of claim 27, wherein said microprocessor is configured to concurrently generate more than one command code sets so as to allow said user interface to control more than one corresponding <b>external devices</b> among said plurality of <b>external devices</b>.</p>			

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<p>34. A communications, command, control and sensing system for communicating with a plurality of <b>external devices</b> comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said <b>external devices</b> wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said <b>external devices</b>;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality</p>			

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<p>of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said <b>external devices</b> and receiving from said <b>external devices</b>, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claim 1]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each</p>	[AGREED]	[AGREED]	<p>“a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate, by the microprocessor, a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required</p>

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<p>communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p><b>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</b></p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices,</p>			<p>to store said command code sets”</p>

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infra-red frequency signals in accordance with said communications protocols.			
<p>[Claim 34]</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p><b>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals</b></p>	[AGREED]	[AGREED]	<p>“a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate, by the microprocessor, based on said parameter sets a desired set of pulse signals corresponding to logical ‘1’s’ and ‘0’s’ as specified by a command code set”</p>

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<p><b>corresponding to logical “1’s” and “0’s” as specified by a command code set;</b></p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claims 1 and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to</p>	[AGREED]	[AGREED]	Plain and ordinary meaning

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<p>operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes <b>a command code set that defines the signals that are employed to communicate with each one of said external devices;</b></p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p>			

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<p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes <b>a command code set that defines the signals that are employed to communicate with each one of said external devices;</b></p> <p>a memory device coupled to said microprocessor configured to store a</p>			

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<p>plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claims 1, 27, and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p>	[AGREED]	[AGREED]	Plain and ordinary meaning

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<p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of <b>parameter sets</b> retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said</p>			

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<p>microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p>27. The communications, command, control and sensing system of claim 1 wherein one of said <b>parameter sets</b> stored corresponding to one of said command code sets is accessible for use so as to create other command code sets.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of</p>			

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<p>reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of <b>parameter sets</b> retrieved by said microprocessor so as to recreate based on said <b>parameter sets</b> a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for</p>			

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transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.			
<p>[Claims 1 and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p><b>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols</b>, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a</p>	<p>“a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols”</p> <p>“a microprocessor configured to generate a plurality of control signals used to operate said system and configured to create a plurality of [reprogrammable] communication protocols” as construed by this Court in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 15-22; Dkt. # 155).</p>	<p>“a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols”</p> <p>“a microprocessor configured to bring into existence two or more control signals used to operate said system and configured to bring into existence two or more [reprogrammable] communication protocols”</p>	

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<p>desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p>			

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<p><b>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols</b> for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a</p>			

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<p>communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claim 2]</p> <p>2. The communication, command, control and sensing system of claim 1 further comprising:</p> <p>a radio frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said devices, radio frequency signals at variable frequencies within a predetermined frequency range and in accordance with said communication protocols; and</p> <p><b>a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to</b></p>	<p>“a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals”</p>	<p>“a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals”</p>	

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<p><b>transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals.</b></p>	<p>“a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as selected by a user, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals” as construed by this Court in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 31-36; Dkt. # 155).</p>	<p>“a multiplexer/demultiplexer controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals”</p>	
<p>[Claims 1 and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to</p>	<p>“a communication protocol”</p> <p>Plain and ordinary meaning, as set out by this Court in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. # 108 at 42-45; Dkt. # 155).</p>	<p>“a communication protocol”</p> <p>“a defined set of rules and formats that allows devices to communicate with each other”</p>	

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<p>operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a <b>communication protocol</b> in response to said user selections; and</p>			

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<p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a</p>			

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<p>plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a <b>communication protocol</b> in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claims 1 and 34]</p> <p>1. A communications, command, control and sensing system for</p>	<p>"a plurality of control signals"</p>	<p>"a plurality of control signals"</p>	

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<p>communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a <b>plurality of control signals</b> used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and</p>	<p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 15-22; Dkt. # 155), plain and ordinary meaning.</p>	<p>"two or more control signals"</p>	

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<p>displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a <b>plurality of control signals</b> used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to</p>			

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<p>communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			

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<p>[Claims 1 and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating <b>a plurality of reprogrammable communication protocols</b>, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory</p>	<p>“a plurality of reprogrammable communication protocols”</p> <p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 15-22; Dkt. # 155), plain and ordinary meaning.</p>	<p>“a plurality of reprogrammable communication protocols”</p> <p>Indefinite. Protocols cannot be reprogrammable. Defendants and Intervenor's provide an alternative construction for this term based on what a reprogrammable communication protocol might be if such a protocol existed: “two or more communication protocols whose rules and formats can be changed through programming”</p>	

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<p>space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said</p>			

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<p>microprocessor creating a <b>plurality of reprogrammable communication protocols</b> for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p>			

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<p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claim 1]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a</p>	<p>“such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets”</p> <p>To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 22-30; Dkt. # 155), plain and ordinary meaning.</p>	<p>“such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets”</p> <p>Indefinite.</p>	

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<p>plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, <b>such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</b></p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claims 1, 27, and 34]</p> <p>1. A communications, command, control and sensing system for</p>	<p>“creating; create”</p> <p>To the extent not covered by this Court's construction</p>	<p>“creating; create”</p> <p>“[bringing / bring] into existence”</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor <b>creating</b> a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and</p>	<p>in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 15-22; Dkt. # 155; Dkt.# 250 at 8-9), plain and ordinary meaning.</p>		

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p>27. The communications, command, control and sensing system of claim 1 wherein one of said parameter sets stored corresponding to one of said command code sets is accessible for use so as to <b>create</b> other command code sets.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor <b>creating</b> a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claims 1-4, 6, 28, and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for <b>generating</b> a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p>	<p>“generating; generated; generate”</p> <p>To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 15-22; Dkt. # 155; Dkt.# 250 at 8-9), plain and ordinary meaning.</p>	<p>“generating; generated; generate”</p> <p>“[bringing / brought / bring] into existence”</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to <b>recreate</b> a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor <b>generating</b> a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>2. The communication, command, control and sensing system of claim 1 further comprising:</p> <p>a radio frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said devices, radio frequency signals at variable frequencies within a predetermined frequency range and in accordance with said communication protocols; and</p> <p>a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set <b>generated</b> by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals.</p> <p>3. The communications command, control and sensing system of claim 2 wherein said user interface further comprises:</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a touch sensitive device <b>generating</b> a plurality of signals in response to actuation and a display device for displaying messages <b>generated</b> by said microprocessor.</p> <p>4. The communications command, control and sensing system of claim 3, wherein said microprocessor generates user selectable graphical icons for display on said display device.</p> <p>6. The communications, command, control and sensing system of claim 1, further comprising a sound activated device coupled to said microprocessor, said sound activated device used to recognize sound signals including sound commands corresponding to executable logical commands, said sound activated device <b>generating</b> signals in response to recognized sound signals for further processing by said microprocessor.</p> <p>28. The communications, command, control and sensing system of claim 27,</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>wherein said microprocessor is configured to concurrently <b>generate</b> more than one command code sets so as to allow said user interface to control more than one corresponding external devices among said plurality of external devices.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for <b>generating</b> a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>said microprocessor so as to <b>recreate</b> based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor <b>generating</b> a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claims 1 and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p>	<p>"recreate"</p> <p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>,</p>	<p>"recreate"</p> <p>"bring something back into existence"</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to <b>recreate</b> a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said</p>	<p>2:16-cv-01096-JRG (Dkt. #108 at 22-30; Dkt. # 155), plain and ordinary meaning.</p>		

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to <b>recreate</b> based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
[Claims 1 and 2]	"a desired command code set"	"a desired command code set"	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate <b>a desired command code set</b>, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality</p>	<p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 22-30; Dkt. # 155), plain and ordinary meaning.</p>	<p>"a different command code set than the command code set that defines the signals that are employed to communicate with each one of said external devices"</p> <p>If this term is not given this meaning, it is indefinite for lacking antecedent basis.</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p>2. The communication, command, control and sensing system of claim 1 further comprising:</p> <p>a radio frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said devices, radio frequency signals at variable frequencies within a predetermined frequency range and in accordance with said communication protocols; and</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a <b>desired command code set</b> generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals.</p>			
<p>[Claims 1 and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p><b>a microprocessor for generating</b> a plurality of control signals used to operate said system, <b>said microprocessor creating</b> a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to</p>	<p>“a microprocessor for generating . . . , said microprocessor creating . . . , a plurality of parameter sets retrieved by said microprocessor . . . , said microprocessor generating . . .”</p> <p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 15-30; Dkt. # 155; Dkt. # 250 at 8-9), plain and ordinary meaning.</p>	<p>“a microprocessor for generating . . . , said microprocessor creating . . . , a plurality of parameter sets retrieved by said microprocessor . . . , said microprocessor generating . . .”</p> <p>“one or more microprocessors, each of which must perform the generating, creating, retrieving, and generating functions”</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store <b>a plurality of parameter sets retrieved by said microprocessor</b> so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, <b>said microprocessor generating</b> a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p><b>a microprocessor for generating</b> a plurality of control signals used to operate said system, <b>said microprocessor creating</b> a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store <b>a plurality of parameter sets retrieved by said microprocessor</b> so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, <b>said microprocessor generating</b> a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claim 2]</p> <p>2. The communication, command, control and sensing system of claim 1 further comprising:</p> <p>a radio frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said devices, radio frequency signals at variable frequencies within a predetermined frequency range and in</p>	<p>“selector”</p> <p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 31-36; Dkt. # 155), plain and ordinary meaning.</p>	<p>“selector”</p> <p>“a multiplexer/demultiplexer”</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>accordance with said communication protocols; and</p> <p>a <b>selector</b> controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals.</p>			
<p>[Claims 1 and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a</p>	<p>“said microprocessor generating a communication protocol in response to said user selection”</p> <p>To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 42-46; Dkt. # 155; Dkt. # 250 at 7-8), plain and ordinary meaning.</p>	<p>“said microprocessor generating a communication protocol in response to said user selection”</p> <p>“said microprocessor generating a communication protocol different from the reprogrammable communication protocols” If this term is not given this meaning, it is indefinite.</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, <b>said microprocessor generating a communication protocol in response to said user selections;</b> and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>accordance with said communications protocols.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, <b>said microprocessor generating a communication protocol in response to said user selections</b>; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claims 1 and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of</p>	<p>“an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, in accordance with said communications protocols”</p>	<p>“an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, in accordance with said communications protocols”</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p>	<p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 31-36, 42-46; Dkt. # 155; Dkt. # 250 at 6-7), plain and ordinary meaning.</p>	<p>"for each of the two or more external devices, the infra-red frequency transceiver must be capable of both transmitting to that device and receiving from that device, in accordance with said communications protocols"</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p><b>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</b></p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p><b>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</b></p>			
<p>[Claim 2]</p> <p>2. The communication, command, control and sensing system of claim 1 further comprising:</p>	<p>“a radio frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said devices, radio</p>	<p>“a radio frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said devices, radio</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p><b>a radio frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said devices, radio frequency signals at variable frequencies within a predetermined frequency range and in accordance with said communication protocols;</b> and</p> <p>a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals.</p>	<p>frequency signals at variable frequencies within a predetermined frequency range and in accordance with said communication protocols”</p> <p>To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 31-36, 42-46; Dkt. # 155; Dkt. # 250 at 6-7), plain and ordinary meaning.</p>	<p>frequency signals at variable frequencies within a predetermined frequency range and in accordance with said communication protocols”</p> <p>“the radio frequency transceiver must transmit and receive signals in accordance with the same protocols as used by the infra-red frequency transceiver of claim 1”</p>	
<p>[Claim 7]</p> <p>7. The communications command, control and sensing system of claim 6, further comprising <b>a sound and data coupling device adapted to receive sound as data signals.</b></p>	<p>“a sound and data coupling device adapted to receive sound as data signals”</p> <p>To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i>,</p>	<p>“a sound and data coupling device adapted to receive sound as data signals”</p> <p>“a device adapted to receive sound as data signals, excluding voice”</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
	2:16-cv-01096-JRG (Dkt. #108 at 22-30; Dkt. # 155; Dkt. # 250 at 3-5), plain and ordinary meaning.		
<p>[Claims 1 and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor <b>configured to</b> store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the</p>	<p>“configured to”</p> <p>To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 22-30; Dkt. # 155; Dkt. # 250 at 3-5), plain and ordinary meaning.</p>	<p>“configured to”</p> <p>“a particularized arrangement of the memory device for a specific purpose”</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor <b>configured to</b> store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with said communications protocols.</p>			
<p>[Claims 1, 2, and 34]</p> <p>1. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p> <p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols, for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p>	<p>“said communications protocols”</p> <p>Plain and ordinary meaning, as set out by this Court in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. # 108 at 42-45; Dkt. # 155; Dkt. # 250 at 7-8).</p>	<p>“said communications protocols”</p> <p>Indefinite.</p>	

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance with <b>said communications protocols.</b></p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>2. The communication, command, control and sensing system of claim 1 further comprising:</p> <p>a radio frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said devices, radio frequency signals at variable frequencies within a predetermined frequency range and in accordance with <b>said communication protocols</b>; and</p> <p>a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals.</p> <p>34. A communications, command, control and sensing system for communicating with a plurality of external devices comprising:</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols for transmission to said external devices wherein each communication protocol includes a command code set that defines the signals that are employed to communicate with each one of said external devices;</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical "1's" and "0's" as specified by a command code set;</p> <p>a user interface coupled to said microprocessor for sending a plurality of signals corresponding to user selections to said microprocessor and displaying a plurality of menu selections available for the user's choice, said microprocessor generating a</p>			

Claims	Plaintiff's Proposed Construction	Defendants' and Intervenor's Proposed Construction	Court's Construction
<p>communication protocol in response to said user selections; and</p> <p>an infra-red frequency transceiver coupled to said microprocessor for transmitting to said external devices and receiving from said external devices, infra-red frequency signals in accordance <b>with said communications protocols.</b></p>			